

FILED

May 1, 2024

SEALED

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: RR
Deputy

Case No: SA:24-CR-00209-OLG

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

UNITED STATES OF AMERICA

Plaintiff

v

**ADERBIS SEGUNDO PIRELA PIRELA
aka "ADERBIS PIRELA",
aka "MARACUCHO"**

Defendant.

INDICTMENT

**COUNT 1: Vio: 18 U.S.C. § 1546(a)
Possession of False Immigration Documents**

**COUNT 2: Vio: 42 U.S.C. § 408(a)(7)(B)
False Representation of a Social Security
Number**

THE GRAND JURY CHARGES:

**COUNT ONE
[18 U.S.C. § 1546(a)]**

On or about February 29, 2024, in the Western District of Texas, Defendant,

**ADERBIS SEGUNDO PIRELA PIRELA,
aka "ADERBIS PIRELA", aka "MARACUCHO"**
did knowingly utter, use, attempt to use, possess, obtain, accept, or receive an alien registration receipt card, or other documents prescribed by statute or regulation for entry into or as evidence of authorized stay and employment in the United States, that is, one Form I-551, or Lawful Permanent Resident Card, which the defendant knew to be forged, counterfeited, altered, falsely

made, and unlawfully obtained, in violation of Title 18, United States Code, Section 1546(a).

COUNT TWO

[42 U.S.C. § 408(a)(7)(B)]

On or about, February 29, 2024 in the Western District of Texas, the Defendant,

ADERBIS SEGUNDO PIRELA PIRELA,

aka “ADERBIS PIRELA”, aka “MARACUCHO”

with the intent to deceive, for the purpose of obtaining something of value from a person, and for other purposes, falsely represented on a USCIS Form I-9 , Employment Eligibility Verification Form, that Social Security number XXX-XX-4472, was the Social Security Account number assigned by the Commissioner of Social Security to him, when in fact, as the defendant well knew, such number was not the Social Security Account number assigned by the Commissioner to him.

In violation of Title 42, United States Code, Section 408 (a)(7)(B).

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE

[See Fed. R. Crim. P. 32.2]

I.

Possession of False Immigration Documents Violation and Forfeiture Statutes

[Title 18 U.S.C. § 1546(a), subject to forfeiture pursuant to Title 18 U.S.C. § 982(a)(6)(A)(ii)]

As a result of the foregoing criminal violation set forth in Count One, the United States gives notice to the Defendant of its intent to seek the forfeiture of certain property upon conviction pursuant to Fed. R. Crim. P. 32.2, Title 18 U.S.C. §§ 982(a)(6)(A)(ii), which state, in pertinent part, the following:

Title 18 U.S.C. § 982. Criminal forfeiture

(a)(6)(A) The court, in imposing sentence on a person convicted of a violation of, or conspiracy to violate, section 274(a) . . . of the Immigration and Nationality Act . . . shall order that the person forfeit to the United States, regardless of any provision of State law—

- (i)** any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense of which the person is convicted; and
- (ii)** any property real or personal—

(I) that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense of which the person is convicted; or

(II) that is used to facilitate, or is intended to be used to facilitate, the commission of the offense of which the person is convicted.

A TRUE BILL



FOREPERSON OF THE GRAND JURY

JAIME ESPARZA
UNITED STATES ATTORNEY

BY:

A handwritten signature in blue ink, appearing to read "Fidel Esparza", written over a horizontal line.

FOR FIDEL ESPARZA III
Assistant United States Attorney